

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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NEW YORKERS AGAINST CONGESTION :
PRICING TAX, *et al.*, :

Plaintiffs, :

v. :

UNITED STATES DEPARTMENT OF :
TRANSPORTATION, *et al.*, :

Defendants. :

----- x
MICHAEL MULGREW, *et al.*, :

Plaintiffs, :

v. :

UNITED STATES DEPARTMENT OF :
TRANSPORTATION, *et al.*, :

Defendants. :
----- x

DECLARATION OF ANDREW G. FRANK

I, Andrew G. Frank, declare as follows:

1. I am an Assistant Attorney General in the New York State Attorney General's Office, counsel for the New York State Department of Transportation (the "Department") in the above-captioned matters.

2. I submit this declaration in support of the Department's motion to dismiss the Department from the above-captioned matters.

3. Attached to this declaration as Exhibit A is a true and complete copy of the Executive Summary of the Final Environmental Assessment for the proposed Central Business District Tolling Program, dated April 2023.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 18, 2024



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